CHALLENGES

As a healthcare service provider, Eu Yan Sang has been complying with patient confidentiality rules and is familiar with having to protecting the personal data of its customers and patients. But with the PDPA coming into effect, it had to review those measures to ensure compliance.

STEPS TAKEN

- **Engaged external legal advice on how to comply with PDPA obligations**
- **Audited its processes and workflows to ascertain potential gaps**
- **Conducted training for staff and compiled compliance manual**
- **Improved data accuracy through customer self-registration on tablets**
- **Limited telemarketing activities to existing customers**

BENEFITS

- **Provided opportunity to review business processes to ensure that personal data of customers / patients are protected**
- **Enhanced data protection measures has improved brand equity**

BUILDING ON A TRUSTED BRAND

Eu Yan Sang is living up to its reputation as a trusted brand through better personal data protection measures

Traditional Chinese Medicine (TCM) company Eu Yan Sang has been safeguarding personal data even before Singapore's data protection laws kicked in last July.

In 2001, it had already implemented measures to comply with patient confidentiality rules set by the Traditional Chinese Medicine Practitioners' Board, which requires healthcare providers to secure the medical information of their patients.

Ms Tang Yock Miin, general manager of Eu Yan Sang's legal and corporate secretarial department says these measures include keeping patient record cards under lock and key, which can only be accessed by clinic assistants and certain management staff on a "need-to-know" basis.

Eu Yan Sang was founded as a Chinese medical hall in 1879 and is a leading integrative health and wellness company that now operates nearly 30 TCM clinics in Singapore, and over 250 retail outlets offering health and wellness products across Asia.

To better understand the needs of its customers, Eu Yan Sang collects the personal data of patients as well as those who sign up for its Eu Rewards membership programme at its retail stores.

"The data would give us insights into their demographics and lifestyles so we can tailor programmes and activities for them," says Ms Tang.

Early mover

Since July 2014, the Personal Data Protection Act (PDPA) requires all organisations in Singapore to seek consent and notify individuals on the collection, use and disclosure of personal data for specific purposes and safeguard such data under their care, among other obligations.

For Eu Yan Sang, complying with the PDPA was simply a matter of beefing up its existing data protection measures.

And it did so as early as October 2012, when it engaged a law firm to do an organisation-wide review of its data protection policies and brief its top management team on the nine PDPA obligations.

The lawyers then proceeded to conduct an audit of the company's data protection processes through written questionnaires and face-to-face interviews with staff and business heads from the retail and clinic businesses, which were flagged out as the two business units affected by the new law.

"We were asked if we had obtained consent, whether we had notified customers about the purpose of collecting personal data, and what we did to ensure the security of personal data," says Ms Tang, who is one of the three appointed data protection officers at Eu Yan Sang. The other two data protection officers are the directors of the company.

The audit revealed potential gaps that needed to be plugged. For example, the auditors found that the Eu Rewards membership forms that were sent from retail outlets to Eu Yan Sang's head office were sometimes not kept under lock and key.

"We addressed that gap by ensuring that employees lock up the forms to prevent personal data from being compromised," Ms Tang says, noting that these are simple yet overlooked practices. "The computer systems that employees use to key in personal data in the forms are also password-protected to prevent unauthorised access."

Ensuring data accuracy

Transferring information from patient registration forms may lead to data errors due to misinterpretation of customers' handwriting, Ms Tang says.

To ensure its customers' data is accurate, Eu Yan Sang has deployed tablet computers as self-registration tools at busier clinics, so that patients can enter their personal information on their own.

The tablets will also be rolled out to retail outlets at a later date, for customers who wish to sign up for the Eu Rewards programme. "That will minimise errors in deciphering what a customer has written," Ms Tang says.

Telemarketing to members

Under the Do Not Call (DNC) Registry rules, telemarketers are not allowed to send telemarketing messages or make telemarketing calls to Singapore telephone numbers listed in the DNC Registry – unless they have clear and unambiguous consent from customers.

As Eu Yan Sang only sends telemarketing messages to Eu Rewards members who have consented to receiving such messages, it does not need to check the DNC Registry. That has helped to lower compliance costs.

Compliance training

Eu Yan Sang compiled its data protection measures into a staff compliance manual, which provides general information on the PDPA obligations and work processes to guide staff on what they should do when dealing with personal data.

"For instance, they have to notify customers on the purpose of collecting personal data," says Ms Tang.

Eu Yan Sang and its law firm also conducted training sessions in English and Chinese languages to familiarise all employees, including retail and clinic staff, with the company's data protections measures.

Some customers, however, have questioned the need to fill in additional fields in membership forms that require them to indicate if they would like to receive telemarketing messages from Eu Yan Sang.

"We just had to explain to customers that we need their consent to send them telemarketing messages," Ms Tang says. "But with the increase in consumer education, consumers are now used to such processes and have become kinder to us."

Eu Yan Sang viewed personal data protection as critical to its core business strategy and hence had made a deliberate decision to invest heavily on staff training and legal advice. Ms Tang says the data protection measures have also given the company an opportunity to review its business processes and strengthen its brand equity.

"Eu Yan Sang is a trusted brand," she says. "The assurance that the personal data of our customers is well-protected adds value to our brand."